

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS RICHARDS,

Plaintiff,

Notice of Motion

-against-

Case No 19-cv-6670

MULTINEX CO. LTD. d/b/a NERDY,

Defendant

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NOTICE OF MOTION FOR DEFAULT JUDGMENT UNDER FRCP RULE 55(b)(2)

PLEASE TAKE NOTICE that, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, and upon the accompanying Declaration of Adam J. Roth and accompanying Exhibits, Plaintiff Thomas Richards move before Honorable Andrew Carter of the Southern District of New York for an Order: (1) granting a default judgment against Defendant Multinex Co. ltd (2) entering a default judgment in the amount of \$2,250,000; and/or (3) ordering an inquest on the amount of damages, and for such other further and different relief that this Court may deem just and proper.

Dated: August 23, 2024

New York, New York

/s/ Adam J. Roth

Adam J. Roth

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